

EXHIBIT 6

**From:** Steven Levatino <[steven@lpfirm.com](mailto:steven@lpfirm.com)>  
**Sent:** Tuesday, September 3, 2024 4:01 PM  
**To:** Dan Richards <[drichards@rrsfirm.com](mailto:drichards@rrsfirm.com)>  
**Cc:** Clark Richards <[crichards@rrsfirm.com](mailto:crichards@rrsfirm.com)>; Albert Carrion <[acarrion@rrsfirm.com](mailto:acarrion@rrsfirm.com)>; Andrew MacRae <[andrew@macraelaw.co](mailto:andrew@macraelaw.co)>; Gregg R. Kronenberger ([gregg@gkronenberger.com](mailto:gregg@gkronenberger.com)) <[gregg@gkronenberger.com](mailto:gregg@gkronenberger.com)>; Karina Esparza <[kesparza@rrsfirm.com](mailto:kesparza@rrsfirm.com)>; Jennifer Richards <[jrichards@rrsfirm.com](mailto:jrichards@rrsfirm.com)>; Lee Roberts <[lee@lpfirm.com](mailto:lee@lpfirm.com)>  
**Subject:** RE: 1088-0001 (LCMS v. CTX)

Dan,

Immediately after I hit the send button on my last email, I heard from Mr. Nate Hill. He is also available on September 25, 2024. I plan on setting Alan Taylors at 9:00 am on September 25, 2024 and Mr. Nate Hill deposition at 1:00 pm on September 25, 2024. Amended notices will be sent by tomorrow.

Sincerely,

Steven Levatino  
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**From:** Steven Levatino  
**Sent:** Tuesday, September 3, 2024 3:51 PM  
**To:** 'Dan Richards' <[drichards@rrsfirm.com](mailto:drichards@rrsfirm.com)>  
**Cc:** Clark Richards <[crichards@rrsfirm.com](mailto:crichards@rrsfirm.com)>; Albert Carrion <[acarrion@rrsfirm.com](mailto:acarrion@rrsfirm.com)>; Andrew MacRae <[andrew@macraelaw.co](mailto:andrew@macraelaw.co)>; Gregg R. Kronenberger ([gregg@gkronenberger.com](mailto:gregg@gkronenberger.com)) <[gregg@gkronenberger.com](mailto:gregg@gkronenberger.com)>; Karina Esparza <[kesparza@rrsfirm.com](mailto:kesparza@rrsfirm.com)>; Jennifer Richards <[jrichards@rrsfirm.com](mailto:jrichards@rrsfirm.com)>  
**Subject:** RE: 1088-0001 (LCMS v. CTX)

Dan,

I have reached out to the witnesses today to see if they are available on the below dates. I have confirmed with Alan Taylor he is available September 25, 2024, and Tom Zachman that he is available September 17, 2024. Please hold those dates on your calendar. I will send out an amended Subpoena with the new dates. I anticipate starting at 9:00 am on both depositions unless you would like another time.

I left a message for Nate Hill and waiting for him to respond.

Sincerely,

Steven Levatino  
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**From:** Dan Richards <[drichards@rrsfirm.com](mailto:drichards@rrsfirm.com)>

**Sent:** Friday, August 30, 2024 1:47 PM

**To:** Steven Levatino <[steven@lpfirm.com](mailto:steven@lpfirm.com)>

**Cc:** Clark Richards <[crichards@rrsfirm.com](mailto:crichards@rrsfirm.com)>; Albert Carrion <[acarrion@rrsfirm.com](mailto:acarrion@rrsfirm.com)>; Andrew MacRae <[andrew@macraelaw.co](mailto:andrew@macraelaw.co)>; Gregg R. Kronenberger ([gregg@gkronenberger.com](mailto:gregg@gkronenberger.com)) <[gregg@gkronenberger.com](mailto:gregg@gkronenberger.com)>; Karina Esparza <[kesparza@rrsfirm.com](mailto:kesparza@rrsfirm.com)>; Jennifer Richards <[jrichards@rrsfirm.com](mailto:jrichards@rrsfirm.com)>

**Subject:** RE: 1088-0001 (LCMS v. CTX)

Steven,

I appreciate you talking with me today about coordinating deposition dates. I was surprised when you noticed the depositions without talking to me and am sorry I could not get back to you sooner. My schedule is tight on such short notice. I have looked at the dates you have proposed and I can

provide some close to those dates, but many of the dates you suggest, I am already scheduled for depositions in other cases.

I am available for any of the three depositions you have proposed on the following dates:

9/4, 9/5

9/9 pm

9/17, 9/18, 9/20pm

9/23, 9/25.

If your rush to get these done is driven by the deadline to add parties I am happy to agree to extend that deadline a few weeks.

Dan

**From:** Steven Levatino <[steven@lpfirm.com](mailto:steven@lpfirm.com)>

**Sent:** Friday, August 23, 2024 2:52 PM

**To:** Dan Richards <[drichards@rrsfirm.com](mailto:drichards@rrsfirm.com)>

**Cc:** Clark Richards <[crichards@rrsfirm.com](mailto:crichards@rrsfirm.com)>; Albert Carrion <[acarrion@rrsfirm.com](mailto:acarrion@rrsfirm.com)>; Andrew MacRae <[andrew@macraelaw.co](mailto:andrew@macraelaw.co)>; Gregg R. Kronenberger ([gregg@gkronenberger.com](mailto:gregg@gkronenberger.com)) <[gregg@gkronenberger.com](mailto:gregg@gkronenberger.com)>

**Subject:** 1088-0001 (LCMS v. CTX)

Dan.

As you know, we are attempting to determine which CTX regents voted for the CTX Amendments, so that we can name them as parties instead of the current placeholders, John Does 1-12. We asked your client to identify those regents in our discovery requests, but were told that CTX does not have that information. Respectfully, we disagree – even if there is no documentation of each specific regent's votes, it would not be difficult for you or your client to check with each regent to confirm their votes, and we ask that you do that.

If we cannot get that information promptly—the pleading deadline is September 27—then we intend to take each regent's deposition and get the information that way. I assume for purposes of depositions, you will represent each current regent, so please confer with them and find out their availability between now and September 20.

With respect to former regents, we would like to take the depositions of Alan Taylor, Nate Hill and Tom Zachman (and perhaps others). Mr. Taylor is available September 10-16, Mr. Hill September 9-13, and Mr. Zachman September 16, 19 or 20. Please let me know which of those dates work best for you. Please get back with me by Monday on scheduling these important depositions. If I do not hear back from you, I may need to go ahead and notice them, but will try to be flexible on rescheduling if necessary.

Thank you.

Sincerely,

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